

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: ) Case No. 09-21477  
) Chapter 7  
NICHOLAS CHRIS BOODRIS and )  
ANASTASIA BOODRIS ) Hon. Pamela S. Hollis  
)  
Debtors. ) Hearing Date: July 24, 2012  
) Hearing Time: 10:30 a.m.

---

**COVER SHEET FOR FIRST AND FINAL APPLICATION FOR  
COMPENSATION AND EXPENSE REIMBURSEMENT OF SEYFARTH SHAW LLP  
AS COUNSEL TO CHAPTER 7 TRUSTEE, GUS A. PALOIAN**

Name of Applicant: Seyfarth Shaw LLP

Authorized to Provide Professional Services to: Chapter 7 Trustee, Gus A. Paloian

Date of Retention: December 10, 2009, effective as of June 12, 2009

Period for which Compensation and Reimbursement is Sought: June 12, 2009 through the close of the case

Amount of Final Compensation Sought: \$6,015.00

Amount of Final Expense Reimbursement Sought: \$61.40

This is a: ☒ Final ☐ Interim Application.

Prior Applications: None

Dated: June 11, 2012

Respectfully submitted,

GUS A. PALOIAN, not individually or  
personally, but solely in his capacity as the  
Chapter 7 Trustee of the Debtors' Estate,

By: /s/ Gus A. Paloian

Gus A. Paloian (06188186)  
James B. Sowka (6291998)  
SEYFARTH SHAW LLP  
131 South Dearborn Street  
Suite 2400  
Chicago, Illinois 60603  
Telephone: (312) 460-5000  
Facsimile: (312) 460-7000

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Case No. 09-21477
	)	Chapter 7
NICHOLAS CHRIS BOODRIS and	)	
ANASTASIA BOODRIS	)	Hon. Pamela S. Hollis
	)	
Debtors.	)	Hearing Date: July 24, 2012
	)	Hearing Time: 10:30 a.m.

---

**FIRST AND FINAL APPLICATION FOR COMPENSATION AND EXPENSE  
REIMBURSEMENT OF SEYFARTH SHAW LLP AS COUNSEL  
TO CHAPTER 7 TRUSTEE GUS A. PALOIAN  
FROM JUNE 12, 2009 THROUGH THE CLOSE OF THE CASE**

Pursuant to Sections 105(a) and 330 of the United States Bankruptcy Code, Seyfarth Shaw LLP ("Seyfarth"), as counsel to Gus A. Paloian, not individually or personally, but solely in his capacity as the duly-appointed Chapter 7 trustee (the "Trustee") of the bankruptcy estate (the "Estate") of the above-captioned debtors (the "Debtors"), hereby submits its First and Final Application for Compensation and Expense Reimbursement (the "Application") for legal services performed, and expenses incurred, during the period of June 12, 2009, through the close of the case (the "Application Period"). In support of this Application, Seyfarth respectfully represents, as follows:

**I. INTRODUCTION**

1. Seyfarth makes this Application pursuant to: (A) Sections 330, 503(a) and (b), and 507(a)(2) of title 11 of the United States Code, 11 U.S.C. §§ 101 through 1330, as amended (the "Bankruptcy Code"); (B) Rule 2016 of the Federal Rules (the "Rules") of Bankruptcy Procedure; (C) certain applicable provisions of the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330, as adopted by the Office of the United States Trustee; (D) Rule 5082-1 of the Local Bankruptcy Rules (the "Local");

Rules”) for the United States Bankruptcy Court for the Northern District of Illinois (the “Court”); (E) that certain Order of the Court, dated December 10, 2009, authorizing Seyfarth’s retention as counsel to the Trustee effective as of June 21, 2009 (the “Seyfarth Retention Order”); and (F) other applicable case law discussed herein (collectively, the “Authorities for Relief”). In this regard, Seyfarth has made every reasonable effort to comply with the Authorities for Relief.

2. In making this Application, Seyfarth respectfully seeks an Order of this Court awarding and authorizing payment from the Estate of final allowance of compensation in the amount of \$6,015.00 (the “Fees”) for professional services rendered by Seyfarth on behalf of the Trustee during the Application Period and for reimbursement of expenses in the amount of \$61.40 (the “Expenses”) for actual and necessary expenses incurred by Seyfarth in the performance of those services.

## **II. JURISDICTION**

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. This matter is before the Court pursuant to 28 U.S.C. § 157 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois. Venue of this Case and this Application is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409. Consideration of this Application is a core proceeding pursuant to 28 U.S.C. § 157(b)(1) and (b)(2)(A), (M), and/or (O). The predicates for the relief requested herein are 11 U.S.C. §§ 105(a), 330, and 331.

## **III. BACKGROUND**

### **A. Case Background**

4. On June 12, 2009 (the “Petition Date”), the Debtors filed their voluntary petition for relief under Chapter 7 of the Bankruptcy Code thereby initiating this case (the “Case”).

5. Shortly thereafter, Gus A. Paloian was appointed as Chapter 7 Trustee for the Estate.

6. Seyfarth was employed as attorneys for the Trustee pursuant to the Seyfarth Retention Order. A copy of the Seyfarth Retention Order is attached hereto as **Exhibit 1**.

7. The Trustee directed Seyfarth to prepare motions requesting Court authority sell the Debtors' personal property consisting of a gun collection and antique slot machines (collectively, the "Property"). On behalf of the Trustee, Seyfarth obtained court authority to conduct sales of the Property pursuant to Court orders dated December 10, 2009 and March 18, 2010, respectively. As a result of the authorized sales, the Trustee recovered gross proceeds of \$27,912.12 for the benefit of the Estate.

**B. Summary of Services Rendered by Seyfarth to the Trustee**

8. This is Seyfarth's First and Final Application for compensation and expense reimbursement in the Case.

9. Seyfarth has neither previously received nor been awarded any compensation of fees, or reimbursement of expenses incurred, related to the Case during the Application Period.

10. In accordance with Section 504 of the Bankruptcy Code, Rule 2016, and the U.S. Trustee Guidelines, no payments have heretofore been made, promised to, or applied by Seyfarth for services rendered or to be rendered or expenses incurred in any capacity whatsoever in connection with the Case. Moreover, no agreement or understanding exists between Seyfarth and any other entity for a division of compensation or expense reimbursement to be received herein or in connection with the Case, other than as permitted under the Bankruptcy Code and Rules.

11. The Fees requested by Seyfarth for legal services rendered to the Trustee during the Application Period aggregate \$6,015.00.

12. All of the Fees for which Seyfarth requests final allowance and payment of compensation relate to the Application Period and were rendered in connection with the Case and in the discharge of Seyfarth's professional responsibilities as counsel to the Trustee. During the Application Period, Seyfarth has rendered 30.90 hours of professional services.

13. A breakdown of the Fees by each Seyfarth professional; each such professional's title, hourly rate, and total hours expended in providing legal services; and the value attributable to such legal services is, as follows:

PROFESSIONAL	TITLE	HOURLY RATES	TOTAL HOURS	VALUE
Gus A. Paloian	Partner	\$540.00 (2009)	2.70	\$1,458.00
James B. Sowka	Sr. Associate	\$310.00 (2009)	0.60	\$186.00
M. Ryan Pinkson	Associate	\$280.00 (2009) \$295.00 (2010)	2.90	\$833.00
Jennifer M. McManus	Paralegal	\$230.00 (2009) \$245.00 (2011)	0.60	\$144.00
Ricki Knapp-Podorovsky	Paralegal	\$220.00 (2010) \$240.00 (2012)	6.10	\$1,424.00
Nina Bouchard	Former Paralegal	\$105.00 (2009) \$110.00 (2010)	17.50	\$1,927.50
Alice Shepro	Case Asst.	\$85.00 (2011)	0.50	\$42.50
<b>TOTAL:</b>			<b>30.90</b>	<b>\$6,015.00</b>

The above-table indicates the respective discounted hourly rates of Seyfarth professionals during the Application Period as adjusted from time to time by Seyfarth pursuant to its normal and customary billing practices.

14. Biographies for the attorneys listed above describing their qualifications and areas of expertise, are grouped and attached hereto as **Exhibit 2**, which is incorporated herein by reference.

15. Seyfarth made every reasonable effort to have the services that it rendered to the Trustee performed by those qualified professionals charging the lowest hourly rates consistent with the level of service, experience, and efficiency required of a given task.

16. The services rendered by Seyfarth on behalf of the Trustee primarily have been in connection with the liquidation of the Property which realized gross proceeds of nearly \$28,000.00 for the benefit of the Estate and general case administration matters and include, but are not limited to: representing and advising the Trustee with respect to sale of the Property; preparing and presenting the Trustee's Motion to Employ Auctioneer to Sell the Debtors' Gun Collection and the Trustee's Motion to Employ Auctioneer to Sell the Slot Machine; preparing and presenting the Trustee's Motion to Employ Attorneys; as requested by the Trustee, preparing and presenting the Trustee's Motion to Employ a Real Estate Broker to Sell the Estate's interest in certain timeshares (ultimately, the Trustee did not receive any offer to purchase the Estate's interest in the timeshares, and will abandon the Estate's interest in that property at closing); Seyfarth investigated the Estate's interest in a state court judgment and advised the Trustee as to the collectability of the asset; preparing this Application; and otherwise advising the Trustee as to his duties and obligations under the Code. In connection with the foregoing, Seyfarth has expended 30.90 hours of services for which it requests compensation in the amount of \$6,015.00.

17. All of the Fees for which Seyfarth requests allowance and payment of compensation relate to the Application Period. Detailed statements of the services performed during the Application Period are attached hereto as **Exhibit 3**.

18. Seyfarth respectfully submits that its services to the Trustee during the Application Period have, in all respects, been reasonable, necessary, and beneficial to the Estate, as further discussed herein.

19. “Section 330(a) [ ] expressly contemplates compensation for preparation of fee applications.” Smith v. Edwards & Hale, Ltd. (In re Smith), 317 F.3d 918, 927 (9th Cir. 2002), cert. denied sub nom. Smith v. Grimmer, 538 U.S. 1032, 123 S. Ct. 204, 155 L. Ed. 2d 1060 (2003); see 11 U.S.C. § 330(a)(6).

**C. Reasonableness of Compensation Requested**

20. In accordance with 11 U.S.C. § 330(a)(1), Seyfarth seeks reasonable compensation for actual and necessary services provided to the Trustee. Such compensation is fair based upon the time, nature, extent and value of such services and the hours expended and the expertise provided. Seyfarth’s efforts have resulted in tangible and substantial benefit to the Estate, as discussed *supra*.

21. Seyfarth has kept its time in tenths of an hour, or six minute increments, to most accurately reflect the specific tasks performed.

22. Seyfarth has, to the best of its ability, kept to a minimum the amount of time spent by its attorneys engaging in intra-office conferences and double-staffing hearings.

23. Under the circumstances, the compensation requested by Seyfarth is fair and reasonable, and its allowance and payment, in full, is justified.

**D. Expenses Incurred by Seyfarth on behalf of Trustee**

24. Seyfarth has incurred actual and necessary expenses in the amount of \$61.40 in the performance of the services rendered to the Trustee in the Case. The expenses primarily relate to photocopying of pleadings filed with the Court. A detailed listing of the expenses incurred is attached hereto as **Exhibit 4**.

**IV. STATEMENT OF APPLICANT PURSUANT  
TO 11 U.S.C. § 504 AND FED R. BANKR. P. 2016**

25. Other than as provided in 11 U.S.C. § 504(b), Seyfarth has not shared or agreed to share any compensation or expense reimbursement as a result of the Case with any person, firm or entity. No agreement or understanding exists between Seyfarth and any other person, firm or entity concerning the sharing of compensation or expense reimbursement received, or to be received, on account of the Case.

**V. RELIEF REQUESTED**

WHEREFORE Seyfarth respectfully requests that the Court enter an Order:

- A. Allowing Seyfarth final compensation in the total amount of \$6,015.00;
- B. Allowing Seyfarth reimbursement of expenses in the amount of \$61.40; and
- C. Granting such other and further relief as this Court deems proper.

Dated: June 11, 2012

Respectfully submitted,

GUS A. PALOIAN, not individually or  
personally, but solely in his capacity as the  
Chapter 7 Trustee of the Debtors' Estate,

By: /s/ Gus A. Paloian

Gus A. Paloian (06188186)  
James B. Sowka (6291998)  
SEYFARTH SHAW LLP  
131 South Dearborn Street, Suite 2400  
Chicago, Illinois 60603  
Telephone: (312) 460-5000  
Facsimile: (312) 460-7000



## **Exhibit 1**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re: ) Case No. 09-B-21477-PSH  
 ) Chapter 7  
NICHOLAS CHRIS BOODRIS and )  
ANASTASIA BOODRIS, ) Hon. Pamela S. Hollis  
 )  
Debtors. )  
\_\_\_\_\_ )

ORDER AUTHORIZING AND APPROVING RETENTION  
AND EMPLOYMENT OF SEYFARTH SHAW LLP AS  
COUNSEL TO CHAPTER 7 TRUSTEE GUS A. PALOIAN

This matter having been presented to the Court upon the Application of Gus A. Paloian, not individually, but solely in his capacity as the Chapter 7 Trustee (the "Trustee") of the bankruptcy estate (the "Estate") of the above-captioned debtors, and upon the accompanying Affidavit of James B. Sowka (the "Sowka Affidavit"), for an order authorizing the employment of Seyfarth Shaw LLP ("Seyfarth") as counsel to represent the Trustee in the above-captioned case (the "Case"); and it appearing to the Court that proper notice of this Application has been provided pursuant to applicable rules and statutes and that no further notice is necessary or required; and the Court being satisfied based on the representations made in the Application and the accompanying Sowka Affidavit that, except as set forth therein, Seyfarth does not represent any interest that is adverse to the Estate and is disinterested under Section 101(14) of the Bankruptcy Code, and that its employment is necessary and is in the best interests of the Estate; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Application is granted; and it is further

ORDERED, that in accordance with 11 U.S.C. §§ 105(a), 327(a) and (d), and 328(a), the Trustee is authorized and empowered to retain and employ Seyfarth as his counsel effective as of

June 12, 2009, on the terms and conditions (the "Terms and Conditions") set forth in the Application and the Sowka Affidavit attached to the Application, and Seyfarth is authorized to perform all of the legal services for the Trustee referenced in the Application on such Terms and Conditions; and it is further

ORDERED, that Seyfarth's compensation and reimbursement in respect of its fees and expenses incurred representing the Trustee shall be subject to further order of the Court in accordance with the procedures and standards set forth in sections 330 and 331 of the Code, such Federal Rules of Bankruptcy Procedure as may be applicable from time to time, and such procedures as may be fixed by order of this Court.

Dated: \_\_\_\_\_

DEC 10 2009

  
\_\_\_\_\_  
HONORABLE PAMELA S. HOLLIS  
UNITED STATES BANKRUPTCY JUDGE

## **Exhibit 2**

**Gus A. Paloian***Partner***Chicago**

Direct: (312) 460-5936

Fax: (312) 460-7936

[gpaloian@seyfarth.com](mailto:gpaloian@seyfarth.com)[vCard](#)

## Biography

### Practices & Sectors

**Bankruptcy,  
Workouts &  
Business  
Reorganization**

Bankruptcy Litigation

Distressed  
TransactionsNon-Bankruptcy  
RemediesGovernment  
Contracts

Commercial Litigation

Real Estate

Development &  
ConstructionDebtor  
Representation

Mr. Paloian is a partner with a practice emphasis in creditors' rights, bankruptcy, and financial litigation. Prior to joining the Firm in 1985, Mr. Paloian clerked for the Honorable Frederick J. Hertz, United States Bankruptcy Judge for the Northern District of Illinois, Eastern Division.

In bankruptcy matters, Mr. Paloian has often represented national banks and finance companies enforcing their remedies and defending their rights. He has represented financial institutions in cases involving debtors in various segments of the manufacturing and service industries and has extensive experience representing financial institutions in real estate bankruptcies, including health club/sporting facilities, office buildings, manufacturing, and warehousing facilities. Mr. Paloian also represents companies in various industries that have experienced financial problems and seek to restructure their financial problems under the Bankruptcy Code. Mr. Paloian was the lead bankruptcy counsel for the Chicago South Shore and South Bend Railroad in its bankruptcy proceedings. Mr. Paloian also serves as a bankruptcy trustee and is a member of the Panel of Trustees for the Northern District of Illinois, Eastern Division.

### Education

- J.D., DePaul University College of Law (1984)  
*cum laude*
- B.A., Northwestern University (1981)
- Certified Lean Six Sigma Yellow Belt

### Admissions

- Illinois

### Affiliations

- American Bankruptcy Institute
- Turn Around Management Association
- National Association of Bankruptcy Trustees
- Chicago Bar Association (Bankruptcy Committee)
- Illinois Bar Association
- American Bar Association

**James B. Sowka**

Associate

Chicago

Direct: (312) 460-5325

Fax: (312) 460-7325

[jsowka@seyfarth.com](mailto:jsowka@seyfarth.com) | [vCard](#)

## Biography

### Practices & Sectors

**Bankruptcy,  
Workouts &  
Business  
Reorganization**

Bankruptcy Litigation

Debtor  
Representation

Insurance

Mr. Sowka is a senior associate in the Chicago office of Seyfarth Shaw LLP. He practices in the areas of bankruptcy law, creditor rights, and commercial and real estate litigation in both federal and state court. His client representations include secured lenders, trade creditors, insurers, real property lessors, chapter 7 and chapter 11 bankruptcy trustees, and preference action defendants. Mr. Sowka is also a member of the SeyfarthLean initiative for landlord-tenant issues in retail bankruptcy cases. SeyfarthLean adopts Lean Six Sigma methodologies through application of a process-driven methodology that involves mapping the delivery of services in order to identify efficiencies and to better predict costs for our clients.

Prior to joining the firm, Mr. Sowka worked as a trial attorney for the U.S. Department of Justice, Office of the U.S. Trustee in both Chicago, Illinois and Miami, Florida where he gained significant experience with bankruptcy asset sales, chapter 11 plan confirmations, chapter 11 trustee and examiner appointments, and investigation and prosecution of bankruptcy fraud and abuse.

Mr. Sowka is an active member of the bar in Illinois and Florida. At the University of Arizona College of Law, Mr. Sowka was a member of the national moot court team and a judicial extern for the Honorable John F. Kelly in Pima County Superior Court in Tucson, Arizona.

## Education

- J.D., University of Arizona College of Law (2004)
- B.A., University of Illinois (1998)  
Phi Kappa Phi; College Honors

## Admissions

- Florida
- Illinois

## Courts

- U.S. District Court for the Northern District of Illinois
- U.S. Court of Appeals for the Seventh Circuit
- U.S. District Court for the Southern District of Florida

## Affiliations

Chicago Bar Association

- Director, Young Lawyers Section (2011-2012)
- Co-Chair, Young Lawyers Section Bankruptcy Committee (2008-2011)

Bankruptcy Court Liaison Committee, Northern District of Illinois

- Representative of the Office of the U.S. Trustee (2007-2008)

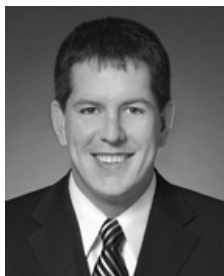
American Bankruptcy Institute

## Presentations

- "Commercial Real Estate in Distress" Chicago Bar Association Young Lawyers Section Bankruptcy Seminar (October 7, 2010)
- "Mortgage Fraud," presented by the Office of the United States Trustee, Chicago Bar Association Young Lawyers Section Bankruptcy Committee Meeting (2008)

## Publications

- Author, "U.S. Supreme Court Resolves Circuit Split In Favor Of Secured Lenders' Credit-Bid Rights In Chapter 11 Bankruptcy Cases," *One Minute Memo* - Seyfarth Shaw (June 4, 2012)
- Co-author, "Not All Retirement Plans Are Created Equal - ERISA Top-Hat Plans Constitute Property of the Bankruptcy Estate," *American Bankruptcy Institute Journal* (September 2011)
- Co-author, "Seventh Circuit Upholds Secured Lenders' Credit-Bid Rights In Chapter 11 Bankruptcy," *Seyfarth Shaw One Minute Memo* (July 15, 2011)
- Co-author, "Lenders' Right to Credit Bid Tested Before 7th Circuit" *The National Law Journal* (November 29, 2010)

**Ryan Pinkston**

Associate

[Chicago](#)

Direct: (312) 460-5578

Fax: (312) 460-7578

[rpinkston@seyfarth.com](mailto:rpinkston@seyfarth.com)[vCard](#)

## Biography

### Practices & Sectors

#### Commercial Litigation

Bankruptcy, Workouts  
& Business  
Reorganization

Mr. Pinkston is a bankruptcy associate in the Chicago office of Seyfarth Shaw LLP. Mr. Pinkston's practice focuses on bankruptcy litigation, creditor rights, corporate reorganizations, pre-bankruptcy planning and negotiations, and commercial litigation. Among other representations, Mr. Pinkston serves as counsel for secured lenders, insurance companies, national banks, trade creditors, and chapter 7 and chapter 11 bankruptcy trustees. He has represented clients in both state and federal trial and appellate courts in such diverse areas as commercial real estate foreclosure, mass torts, insurance coverage disputes, chapter 11 plan confirmation, bankruptcy asset sales, preference and fraudulent transfer prosecution and defense, breach of contract, and civil rights.

Mr. Pinkston was recognized as a member of Seyfarth Shaw's 2010 Pro Bono Team of the Year and as runner-up for 2010 Pro Bono Associate of the Year. He is also an active member and committee chair on the Associate Board of Ambassadors for the American Cancer Society of Illinois.

### Education

- J.D., Indiana University - Bloomington (2008)  
*magna cum laude*  
Articles Editor, *Federal Communications Law Journal*  
Order of the Coif  
Dean's List (2005-2008)
- B.A., Washington University in St. Louis (2005)

### Admissions

- Illinois

### Courts

U.S. District Courts for the Northern, Central, and Southern Districts of Illinois

### Affiliations

- Chicago Bar Association
- American Cancer Society of Illinois, Associate Board of Ambassadors (Chair, Discovery Ball Sub-Committee)
- Turnaround Management Association

### Presentations

- Co-presenter, "Practice Pointers in Preference Litigation," Chicago Bar Association (April 5, 2011)

### Publications



- Co-author, "Second Circuit's Opinion May Insulate Payments Previously Beyond Bounds Of Bankruptcy Code Section 546(e)," *Seyfarth Shaw One Minute Memo* (September 7, 2011)
- Co-author, "Identifying Corporate and Personal Liability: Issues for D&Os in the Zone of Insolvency," *Business Law & Governance* (June 2011)
- Co-author, "The Implied Warranty of Habitability in Illinois: A Critical Review," 98*Illinois Bar Journal* 92 (February 2010)

## **Exhibit 3**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
09/10/09	N. Bouchard	Multiple phone calls to local firearm dealers regarding sale of assets.	0.80	84.00
09/16/09	G. Paloian	Telephone conference with Steve Brown regarding case status and investigation; review memo regarding Debtor assets.	0.50	270.00
09/16/09	G. Paloian	Telephone conferences regarding gun collection and auctioneer services.	0.30	162.00
09/17/09	G. Paloian	Telephone conferences with auctioneers regarding sale of gun collection and licensing requirements (.40); telephone conferences with realtor regarding sale of time shares (.30).	0.70	378.00
09/17/09	N. Bouchard	Phone call with potential buyer regarding Debtor's firearm collection.	0.20	21.00
09/18/09	N. Bouchard	Follow-up with Debtor's attorneys regarding sale of assets.	0.30	31.50
09/23/09	G. Paloian	Telephone conference with Listing agent regarding sale of time share.	0.30	162.00
09/25/09	N. Bouchard	Draft motion to retain HRA Realty regarding sale of Debtor's timeshare interests for G. Paloian.	0.80	84.00
09/28/09	N. Bouchard	Revise HRA Realty retention application for G. Paloian.	0.20	21.00
09/29/09	N. Bouchard	Phone conversation with Dan Kull regarding retention to liquidate Debtor's gun collection (.20); telephone call with Trustee regarding same (.10).	0.30	31.50
10/02/09	N. Bouchard	Phone call to Dan Kull regarding liquidation of Debtor's gun collection.	0.10	10.50
10/05/09	N. Bouchard	Phone conversation with Dan Kull regarding contract and commission to auction Debtor's gun collection.	0.20	21.00
10/09/09	N. Bouchard	Phone conversation with Dan Kull regarding contract to auction Debtor's gun collection.	0.10	10.50
10/12/09	G. Paloian	Telephone conference with gun auctioneer regarding terms of engagement and handling and processing of gun collection.	0.40	216.00
10/26/09	N. Bouchard	Phone conversation with Debtor's counsel regarding liquidation of firearms (.20); conversation with Dan Kull regarding same (.20).	0.40	42.00
10/28/09	N. Bouchard	Revise motion to retain HRA Realty (.30); prepare motion to retain Dan Kull as auctioneer (1.00).	1.50	157.50
11/02/09	G. Paloian	Revise applications to retain real estate broker (.20) and auctioneer (.30).	0.50	270.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
11/02/09	N. Bouchard	Prepare Daniel Kull declaration regarding application for retention of auctioneer (.50); prepare realtor declaration regarding retention of same (.50); phone call to Debtor's counsel regarding Debtor's interest in purchasing property from Estate (.20).	1.20	126.00
11/03/09	N. Bouchard	Revise application to retain realtor (.10); revise application to retain Dan Kull (.10); phone conversation with broker at HRA Realty regarding execution of declaration for retention application (.10); correspondence to same enclosing declaration for execution (.20); correspondence to Dan Kull enclosing declaration for execution regarding retention application (.20).	0.70	73.50
11/09/09	N. Bouchard	E-mail correspondence to Dan Kull regarding execution of declaration to retention application (.10); phone conversation with Gynne O'Dare at HRA Realty regarding execution of declaration to retention application (.20).	0.30	31.50
11/12/09	N. Bouchard	Follow-up email to Dan Kull regarding declaration for retention application.	0.20	21.00
11/16/09	J. Sowka	Review and revise motion to retain auctioneer.	0.20	62.00
11/16/09	J. Sowka	Review and revise motion to retain broker.	0.20	62.00
11/16/09	J. McManus	Edit motion to retain auctioneer (.10); confer with N. Bouchard regarding same (.10).	0.20	46.00
11/17/09	M. Pinkston	Conference with N. Bouchard regarding motions for retention of auctioneer and realtor.	0.20	56.00
11/17/09	N. Bouchard	Revise retention applications to retain.	0.30	31.50
11/18/09	N. Bouchard	Prepare motion to retain Seyfarth Shaw (.80); prepare affidavit of James Sowka regarding same (1.50).	2.30	241.50
11/20/09	J. Sowka	Review and revise application to retain Seyfarth Shaw as counsel and accompanying affidavit.	0.20	62.00
11/20/09	N. Bouchard	Revise Trustee's motion to retain Seyfarth Shaw(.20); cause same to be filed with the Court (.20); oversee service of same (.20); revise Trustee's motion to retain Kull Auction & Real Estate Co. (.20); cause same to be filed with the Court (.20); oversee service of same (.20); revise Trustee's motion to retain HRA Realty, Inc. (.20); cause same to be filed with the Court (.20); oversee service of same (.20).	1.90	199.50
12/10/09	M. Pinkston	Review trustee's motion to retain Seyfarth Shaw as counsel, motion for approval of hiring real estate agent, and motion for approval of hiring auctioneer in preparation for hearing	0.80	224.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
12/10/09	M. Pinkston	Represent G. Paloian as trustee at hearing on trustee's motion to retain Seyfarth Shaw as counsel, motion for approval of hiring of real estate agent, and motion for approval of hiring auctioneer	0.50	140.00
01/04/10	N. Bouchard	Follow-up email to Dan Kull regarding status of sale of gun collection (.20); correspondence to HRA Realty regarding status of sale of time share interests (.30).	0.50	55.00
01/13/10	N. Bouchard	E-mail to D. Kull regarding liquidation of firearms for G. Paloian (.10); phone conversation with Gwenn O'Dare at HRA Realty regarding efforts to sell Debtor's timeshare weeks (.20).	0.30	33.00
01/27/10	N. Bouchard	Review listings regarding sale price of time share weeks for G. Paloian (.50); e-mail correspondence to Debtor's counsel regarding detailed description of antique slot machine (.10).	0.60	66.00
01/29/10	N. Bouchard	E-mail correspondence to Chris Matsakas regarding liquidation of antique slot machine.	0.20	22.00
02/08/10	M. Pinkston	Conference with N. Bouchard regarding retention of professional to sell antique slot machine	0.10	29.50
02/10/10	N. Bouchard	Prepare motion to retain Chicago Liquidator Service regarding antique slot machine.	1.00	125.00
02/11/10	N. Bouchard	E-mail correspondence with Chris Matsakas regarding listing price of antique slot machine.	0.10	12.50
02/12/10	N. Bouchard	Revise motion to retain autioneer (.30); revise affidavit regarding same (.20); revise sale agreement (.20).	0.70	87.50
02/19/10	M. Pinkston	Review and revise retention application for liquidation service to sell asset of estate	0.50	147.50
02/22/10	N. Bouchard	Revise motion to retain Chicago Liquidators Services (.20); e-mail correspondence to Chris Matsakas regarding execution of affidavit for filing of retention motion (.10).	0.30	37.50
02/23/10	N. Bouchard	Follow-up e-mail to Chris Matsakas regarding execution of affidavit to retention motion (.10); finalize retention motion (.30); cause same to be filed with the court (.20).	0.60	75.00
03/02/10	N. Bouchard	Follow-up email to HRA Realty regarding status of sale of Debtors' timeshare properties.	0.10	12.50
03/03/10	N. Bouchard	Review listing of Debtor's timeshare weeks regarding sale of same.	0.20	25.00
03/18/10	M. Pinkston	Review motion to retain Chicago Liquidators to sell assets of debtor's estate at auction in preparation for hearing on same (.30); represent Trustee at hearing regarding motion to retain Chicago Liquidators (.30).	0.60	177.00
03/18/10	N. Bouchard	Prepare hearing materials for R. Pinkston regarding motion to retain Chicago Liquidator Services.	0.10	12.50

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
03/29/10	N. Bouchard	Two (2) phone conversation with Chicago Liquidators Services regarding pick-up of assets (.20); e-mail correspondence to Debtor's counsel regarding same (.10).	0.30	37.50
03/31/10	N. Bouchard	Confirm receipt of antique slot machine with Chicago Liquidator Services (.10); phone conversation with Chris Matsakas regarding value and auction of same (.30).	0.40	50.00
04/07/10	M. Pinkston	Review motion for abandonment of property by trustee	0.20	59.00
04/12/10	N. Bouchard	E-mail correspondence to Chris Matsakis regarding estimated value of Debtor's slot machine collection.	0.10	12.50
04/21/10	N. Bouchard	E-mail to G. Paloian regarding starting bid for antique slot machine collection (.10); discuss same with Chris Matsakas (.10).	0.20	25.00
08/27/10	R. Knapp	Review claims (.10); review retention agreement of HCA and timeshare (.10); review and analyze docket of Quercia non-PI tort claim filed prepetition by Debtor (.30); meet with G. Paloian to discuss (.20); phone call to attorney Hector who represents Debtor in lawsuit (.10).	0.80	176.00
08/31/10	R. Knapp	Phone conversation with L. Hector regarding: judgment awarded in favor of debtor and turnover of information to Trustee.	0.30	66.00
09/10/10	R. Knapp	Review judgment order and letter received from L. Hector regarding state court action in which Debtor was awarded approximately \$25k (.30); online research regarding judgment defendant for whereabouts and information for collection (.10).	0.40	88.00
09/28/10	R. Knapp	Phone conversations with L. Hector regarding: judgment against S. Quercia (.20); review judgment order to determine Debtor's interest in judgment (.10); memo to G. Paloian regarding: same (.20).	0.50	110.00
02/07/11	J. McManus	Review State Court litigation docket to determine status of Asset No. 11 on Debtor's schedules.	0.20	49.00
02/08/11	J. McManus	Confer with G. Paloian regarding pending scheduled litigation (.10); confer with R. Podorovsky regarding same (.10).	0.20	49.00
03/07/11	A. Shepro	Confer with J. McManus regarding motion to retain Lois West, CPA (.10); edit same motion (.40).	0.50	42.50
04/27/12	R. Knapp	Begin preparation of Seyfarth final fee application.	0.30	72.00
05/16/12	R. Knapp	Review/edit time detail in preparation of Seyfarth fee application.	0.50	120.00
05/20/12	R. Knapp	Draft Seyfarth final fee application (2.00); prepare coversheet, proposed order and exhibits (.80); review/edit same (.50).	3.30	792.00
<b>TOTALS</b>			<b>30.90</b>	<b>\$6,015.00</b>



## **Exhibit 4**



**DISBURSEMENTS**

**Copying**

<b><u>Date</u></b>	<b><u>Disbursements</u></b>	<b><u>Value</u></b>
11/23/09	Copying	3.60
02/01/10	Copying	0.20
02/23/10	Copying—Motion to Retain Auctioneer to Conduct Sale of Property	57.60
	<b>TOTAL</b>	<b>\$ 61.40</b>